

VINCENT COX (State Bar No. 070511)
ELIZABETH L. SCHILKEN (State Bar No. 241231)
LEOPOLD, PETRICH & SMITH, P.C.
2049 Century Park East, Suite 3110
Los Angeles, California 90067-3274
Telephone: (310) 277-3333
Facsimile: (310) 277-7444
Email: vcox@lpsla.com

Attorneys for
Plaintiff Bagdasarian Productions, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BAGDASARIAN PRODUCTIONS,
LLC, a California limited liability
company,

Plaintiff,

v.

THE JERRY NAYLOR COMPANY,
LLC, an Oregon limited liability
company, dba NAYCO
ENTERTAINMENT GROUP, JERRY
NAYLOR, an individual, SAN JUAN
MUSIC GROUP LTD., a New Jersey
corporation, MICHAEL CHERNOW, an
individual, MEGABOP RECORDS LTD.,
trading as MBOP DIGITAL, and DOES
1-10, inclusive,

Defendants.

CASE NO. 2:11-CV-5270 CAS (MRWx)

[U.S. Dist. Judge Christina A. Snyder]

NOTICE OF SETTLEMENT

[USDC CD Cal L.R. 40-2]

1 Plaintiff Bagdasarian Productions, LLC hereby informs the court that it has
2 reached agreement with the following defendants to settle the action, and that it
3 anticipates that the executory provisions of the settlement will require an additional 40
4 days until a dismissal of the action can be entered. The parties with whom settlement
5 agreement has been reached are:

- 6 1. Jerry Naylor;
- 7 2. The Jerry Naylor Company, LLC, dba NAYCO Entertainment Group;
- 8 3. Michael Chernow; and
- 9 4. San Juan Music Group, Ltd.

10 The remaining named defendant, Megabop Records Limited, trading as MBOP
11 Digital, and the DOE defendants, DOES 1-10, inclusive, will be dismissed without
12 prejudice, and these settlements of the action will conclude the matter in its entirety.

13
14 DATED: September 30, 2011

Respectfully submitted,

LEOPOLD, PETRICH & SMITH, P.C.

15
16
17 By: 

VINCENT COX
ELIZABETH L. SCHILKEN
Attorneys for
Plaintiff Bagdasarian Productions, LLC

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is **2049 Century Park East, Suite 3110, Los Angeles, California 90067-3274.**

On September 30, 2011, I served the foregoing document described as **NOTICE OF SETTLEMENT** on the interested parties in this action.

☒ by placing the original and/or a true copy thereof enclosed in (a) sealed envelope(s), addressed as follows:

S. Martin Keleti
Cohen & Cohen
8340 Melrose Ave
Los Angeles, CA 90069
Fax: 323-655-3333

*Attorney for Defendants for Michael
Chernow and San Juan Music Group*

Randal Ivor-Smith
Raines Feldman LLP
9720 Wilshire Boulevard 5th Floor
Beverly Hills, CA 90212
Fax: 310-765-7730
Attorney for Jerry Naylor and the Jerry
Naylor Company

☒ **BY REGULAR MAIL:** I deposited such envelope in the mail at 2049 Century Park East, Suite 3110, Los Angeles, California 90067-3274. The envelope was mailed with postage thereon fully prepaid.

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

☐ **BY FACSIMILE MACHINE:** I transmitted a true copy of said document(s) by facsimile machine, and no error was reported. Said fax transmission(s) were directed as indicated on the service list.

☐ **BY ELECTRONIC MAIL:** I transmitted a true copy of said document(s) by electronic mail, and no error was reported. Said electronic mail transmission(s) were directed as indicated on the service list.

☐ **BY OVERNIGHT MAIL:** I deposited such documents at the Federal Express Drop Box located at 2049 Century Park East, Suite 3110, Los Angeles, California 90067-3274. The envelope was deposited with delivery fees thereon fully prepaid.

☐ **BY PERSONAL SERVICE:** I caused such envelope(s) to be delivered by hand to the above addressee(s).

☐ (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 30, 2011, at Los Angeles, California.


Robin Black